FILED

MAY 14 2013

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

RITA C. HALEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:11-cv-265
	)	*Lee*
DR. SOBROTO KUNDU, Individually and	)	
d/b/a Neurology and Neurodiagnostics, *et al.*,	)	
	)	
Defendants.	)	

VERDICT FORM

1. Have DEFENDANTS proved by a preponderance of the evidence that PLAINTIFF was exempt from the Fair Labor Standards Act ("FLSA") overtime requirements?

YES (YES/NO)

[*If you answered "YES" to Question 1, proceed to Question 4. If you answered "NO" to Question 1, proceed to Question 2.*]

Overtime Claim

2. Has PLAINTIFF proved by a preponderance of the evidence that she was not paid overtime for hours worked in excess of 40 hours per week pursuant to FLSA requirements?

__________ (YES/NO)

[If you answered "YES" to Question 2, proceed to Question 3. If you answered "NO" to Question 2, proceed to Question 4.]

3. We, the jury, find that PLAINTIFF is entitled to damages from DEFENDANTS for unpaid overtime in the following amount:

$_________________________.

[*Please proceed to Question 4.*]

Retaliation Claim

4. Has PLAINTIFF proved by a preponderance of the evidence that she engaged in protected activity under the FLSA?

NO (YES/NO)

[*If you answered "YES" to Question 4, proceed to Question 5. If you answered "NO," your deliberations are complete. Please have the foreperson sign the verdict form and notify the Courtroom Deputy that you have reached a verdict.*]

5. Has PLAINTIFF proved by a preponderance of the evidence that there was a causal connection between her protected activity and her termination?

__________ (YES/NO)

[*If you answered "YES" to Question 5, proceed to Question 6. If you answered "NO," your deliberations are complete. Please have the foreperson sign the verdict form and notify the Courtroom Deputy that you have reached a verdict.*]

6. We, the jury, find that PLAINTIFF is entitled to damages from DEFENDANTS for her retaliation claim in the following amounts:

Damages for back pay $____________________

Damages for embarrassment and humiliation $____________________

Damages for front pay $____________________

[*If you **did not** award any damages to Plaintiff in Question 6, please proceed to Question 7. If you **did** award damages to Plaintiff in Question 6, please proceed to Question 8.*]

7. We, the jury, find that PLAINTIFF is entitled to nominal damages from DEFENDANTS in the following amount:

$____________________.

[*Please proceed to Question 8.*]

8. a. Is PLAINTIFF entitled to punitive damages from DEFENDANT DR. KUNDU for her retaliation claim?

__________ (YES/NO)

b. Is PLAINTIFF entitled to punitive damages from DEFENDANT ROMA TRAKRU for her retaliation claim?

__________ (YES/NO)

[*If you answered "YES" to Question 8(a) or (b), you will not determine an amount of punitive damages at this time. Your deliberations are complete. Please have the foreperson sign the verdict form and notify the Courtroom Deputy that you have reached a verdict.*]

SIGNATURE REDACTED

Foreperson

5/14/2013

Date